

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SECUREBUY, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 13-1792 (LPS)
)	
CARDINAL COMMERCE CORPORATION,)	
)	
Defendant.)	

**SECUREBUY, LLC'S
MOTION FOR INJUNCTION**

WHEREAS, Plaintiff, SecureBuy, LLC desires to resolve the above-referenced action and has voluntarily removed its accused products and services from the market;

WHEREAS, Defendant, CardinalCommerce Corporation has indicated that so long as no injunction against SecureBuy exists, there is a possibility of future harm to Defendant, CardinalCommerce Corporation;

WHEREAS, Plaintiff, SecureBuy, LLC desires to remove any the possibility of future harm to Defendant, CardinalCommerce Corporation, Plaintiff, SecureBuy, LLC; and

WHEREAS, Plaintiff, SecureBuy, LLC desires to eliminate the burden of litigation on this Court and on the Parties to this Action;

THEREFORE, SecureBuy, LLC respectfully requests and moves this Court for an injunction enjoining SecureBuy, LLC from making, using, offering for sale, or selling in the United States, its 3D-Secure MPI product known as the "SecureBuy 2.0 3D-Secure MPI" (the "accused products and services"), as well as any other hosted 3D-Secure MPI product as defined

in the attached injunction, either alone or in combination with other products or services, for the life of U.S. Patent No. 7,051,002; 7,763,783; and 8,140,429 (collectively, the “patents-in-suit”).

/s/ *John W. Shaw*

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Dated: May 23, 2014

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SECUREBUY, LLC,)	
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CARDINAL COMMERCE CORPORATION,)	
)	
Defendant.)	

[PROPOSED] ORDER OF INJUNCTION

At Wilmington this _____ day of _____, 2014, the Court having considered the motion of Plaintiff SecureBuy, LLC for an injunction; **IT IS ORDERED** that the motion is **GRANTED**.

INJUNCTION

1. SecureBuy, LLC has been accused of infringing U.S. Patent No. 7,051,002; 7,763,783; and 8,140,429 (collectively, the “patents-in-suit”) by making, using, offering for sale, or selling in the United States, its 3D-Secure MPI product known as the “SecureBuy 2.0 3D-Secure MPI” (the “accused products and services”).
2. For the life of the patents-in-suit, SecureBuy, LLC is **ENJOINED** from making, using, offering for sale, or selling in the United States, the accused products and services;
3. For the life of the patents-in-suit, SecureBuy, LLC is **ENJOINED** from making, using, offering for sale, or selling in the United States, any product or service defined as follows:

a. Unauthorized Hosted 3D-Secure MPI Products and Services Covered By

Injunction: A product or service not offered by CardinalCommerce Corporation that enables authentication of the 3D-Secure Initiative for multiple merchants by providing one or more plug-ins on a third party server capable of facilitating 3D-Secure authentication of a consumer in connection with a commercial transaction with a merchant.

4. Either party may seek an adjustment to this injunction for good cause.

United States District Judge